

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DONALD ABDUA, et al.,

*Plaintiffs,*

v.

STRONGBLOCK, et al.,

*Defendants.*

Case No. 1:22-cv-10869-LTS-BCM

**DECLARATION OF PAYTON H. POLIAKOFF ISO PLAINTIFFS' OPPOSITION  
TO DEFENDANTS' MOTION TO DISMISS AND COMPEL ARBITRATION**

I, Payton H. Poliakoff, declare:

1. I am an attorney at Zeisler Law, PLLC, counsel to Plaintiffs.
2. Attached hereto as **Exhibit A** is a true and correct copy of a list of each Plaintiff, the number of nodes they purchased, and the dates of their first and last purchase of a node.
3. Attached hereto as **Exhibit B** are true and correct copies of Cayman Islands General Registry Director Details and Search Report for Jenison Holdings SEZC.
4. Attached hereto as **Exhibit C** is a true and correct copy of the U.S. Patent and Trademark Office's Trademark Status for the Strongblock trademark registered to Jenison Holdings SEZC.
5. Attached hereto as **Exhibit D** is a true and correct copy of the Declaration of Andrew Johnstone submitted by Plaintiffs in response to Defendants' motion to dismiss the related case of *Crowl, et al., v. StrongBlock, et al.*, Case No. 1:22-cv-07313.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: April 10, 2023

/s/ Payton H. Poliakoff  
Payton H. Poliakoff